

## SUBMISSION TO THE INDEPENDENT REVIEW OF THE WILDLIFE ACT 1975

### Introduction

The International Fund for Animal Welfare (IFAW) is a global non-profit helping animals and people thrive together. Working in more than 40 countries around the world we rescue, rehabilitate and release animals and restore and protect their natural habitats.

IFAW welcomes the opportunity to provide input to this important and much-needed review. We would like to thank and acknowledge the attached comprehensive joint submission made by our friends at the Humane Society International Australia (HSI) in collaboration with Environmental Justice Australia (EJA) and fully endorse the contents of this submission.

In addition we would like to expand below on a couple of points (1 and 3.6) of particular relevance and concern, based on our experience working with the DELWP and the rehabilitation sector.

We would also like to take the opportunity to thank DELWP for its commendable response to feedback from the wildlife community post bushfires and its thorough engagement on reviewing its response to wildlife welfare in emergencies.

### 1. What should the Act do?

One of IFAW's key guiding principles is that conservation and welfare policy should be based on sound science, within an ethical framework that recognises the intrinsic value of individual animals and species, and the welfare needs of animals as sentient beings.

IFAW believes that, as humans, we have a moral responsibility to provide for the needs of those animals who are dependent on us. This responsibility extends to protecting wild animals and their habitats from human harm, whether caused intentionally or unintentionally. Responsible human behavior should prevent, avoid, or at the very least, minimise direct and indirect harm to all animals and this principle should be reflected and enforced in any relevant legislation. Where human and wildlife interests conflict, the legislation should provide a framework to manage these conflicts in a manner consistent with these overarching objectives.

In light of this, IFAW believes that an ecological and humane approach to the management, protection, conservation and recovery actions concerning native wildlife should be the pre-eminent framework for design and operation of the Act. The Act should be primarily based on the recognition of the intrinsic value of wildlife, but should also provide a framework for recognising cultural values to human communities in relation to wildlife, especially Victoria's First Nations' peoples.

### 3.6 The Act doesn't have a mechanism for the making of mandatory codes, standards or guidelines

IFAW acknowledges that in its current form, the Act does not contain the power to develop and issue mandatory codes, standards or guidelines to stipulate how activities relating to wildlife must be lawfully conducted and believes that such a mechanism should be instated, including those activities relating to wildlife rescue, rehabilitation and release.

#### 3.6.1 Should the Act contain provisions that allow for issuing mandatory codes of practice, standards or guidelines?

#### 3.6.2 What activities could most benefit from the development of mandatory codes or standards?

Currently wildlife shelter operators and carers only need to meet minimum standards for the humane treatment and successful rehabilitation of wildlife.

IFAW believes that, in the interests of ensuring best practice and best possible welfare outcomes for the rescue, rehabilitation and release of native wildlife, the Act should contain the power to develop and issue mandatory codes of practice, standards and guidelines.

This should include an overarching mandatory Code of Practice for the Welfare of Wildlife during Rehabilitation and accompanying species-specific codes, particularly for those species requiring specialist treatment including, but not limited to koalas, birds of prey and seabirds.

These codes should be developed in consultation with key trusted and respected wildlife rehabilitators, and veterinarians with experience in treating wildlife, with a good clean track record of best practice in caring for the specific animals and working collaboratively with other rehabilitators and with DELWP.

These codes should be directly enforceable if they are not adhered to. The intention of this is not to be over regulate the sector but rather to ensure a high and uniform standard of care.

IFAW also believes that there needs to be a more stringent process of assessing and granting wildlife rehabilitation licenses. Again, the intention of this is to ensure that license holders meet certain criteria in terms of ability, experience and suitable resources required to care for wildlife, particularly in the case of those animals that have specific rehabilitation needs including (but again not limited to) koalas, birds of prey and seabirds. Ideally the wildlife rehabilitator should have undertaken some pre-requisite practical training or apprenticeship before being issued a license to care for these animals.

We believe that this precautionary approach in ensuring pre-requisite conditions are met prior to obtaining a license is preferable to the reactionary approach of trying to revoke a license in the case of non-compliance (recognising this latter approach will obviously still need to be enacted but hopefully in a reduced number of instances).

## Koalas in blue gum plantations

IFAW would also like to raise here our ongoing concern regarding the welfare of koalas in blue gum plantations. We welcome the efforts of DELWP and the Office of the Conservation Regulator to address what it is a huge and complex problem and the subsequent consultation undertaken in the development of the revised regulatory approach.

However, IFAW remains concerned about the ability of this approach to provide real protection for koalas and would like to see a goal of zero harm, as opposed to just an improvement on the previous incident rate as per the Koala Index.

We would like to see more stringent preventative measures enacted, such as not granting a license to disturb koalas under the Act unless the operator can guarantee zero harm to koalas.

We would also like to see a stronger more pro-active enforcement approach to send a strong message to the blue gum industry that non-compliance will not be tolerated.

Thank you for the opportunity to engage in this important process that will shape the future for the treatment and protection of wildlife in Victoria.

Yours sincerely



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*IFAW acknowledges the Traditional owners of country throughout Australia and the Oceania region and their connection to land, waters and culture. We pay our respects to their Elders, past, present and emerging.*